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18 UBER TECHNOLOGIES, INC., RASIER, LLC,
 19 and RASIER-CA, LLC

20 **UNITED STATES DISTRICT COURT**

21 **NORTHERN DISTRICT OF CALIFORNIA**

22 **SAN FRANCISCO DIVISION**

23 IN RE: UBER TECHNOLOGIES, INC.,
 24 PASSENGER SEXUAL ASSAULT
 25 LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF WILLIAM ANDERSON
 IN SUPPORT OF DEFENDANTS UBER
 TECHNOLOGIES, INC., RASIER, LLC,
 AND RASIER-CA, LLC'S OPPOSITION TO
 PLAINTIFFS' MOTION TO ENFORCE PTO
 NO. 2 AND TO COMPEL DEFENDANTS TO
 PRODUCE LITIGATION HOLD AND
 PRESERVATION INFORMATION**

26 This Document Relates To:

27 ALL ACTIONS

Judge: Honorable Lisa J. Cisneros

Date: January 4, 2024

Time: 1:30 PM

Courtroom: G – 15th Floor

3:23-MD-3084-CRB

DECLARATION OF WILLIAM ANDERSON IN SUPPORT OF DEFENDANTS' OPPOSITION TO
 PLAINTIFFS' MOTION TO ENFORCE PTO NO. 2 AND TO COMPEL DEFENDANTS
 TO PRODUCE LITIGATION HOLD AND PRESERVATION INFORMATION

1 I, William Anderson, declare pursuant to 28 U.S.C. § 1746:

2 1. I am over the age of 18 and a resident of Denver, CO. I submit this declaration in
3 support of Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC's (collectively,
4 "Uber") Opposition to Plaintiffs' Motion to Enforce PTO No. 2 and to Compel Defendants to
5 Produce Litigation Hold and Preservation Information.

6 2. I am presently employed by Uber Technologies, Inc. as Sr. eDiscovery Analyst II. I
7 have been employed by Uber since 2016. In my role, I am familiar with Uber's various platforms
8 and the functionality of Uber's litigation hold systems and processes, including those utilized in
9 the above captioned matter. I am familiar with the statements made in this declaration and, if
10 called as a witness, I could and would competently and truthfully testify thereto.

11 3. Uber has a series of policies related to the retention and automatic deletion of
12 different sources of electronic data.

13 4. Under Uber's current email retention policy, which has been in place since January
14 2023, emails are automatically retained for 24 months. Prior to that, emails were automatically
15 retained for at least 6 months.

16 5. Under Uber's current retention policies, Google Drive documents are not
17 automatically deleted at any point in time.

18 6. Uber has additional policies in place that provide for the automatic retention of
19 other electronic data sources for services used by Uber employees, such as Slack and Box.

20 7. Under all of these policies, including the prior email retention policy, there is an
21 exception to automatic deletion for current or former employees whose account is subject to a legal
22 hold.

23 8. When a current or former employee's account is placed on a legal hold, the
24 individual's electronic materials are preserved regardless of the subject matter of the litigation.

25 9. Uber has placed legal holds in connection with this litigation with respect to the
26 accounts of approximately 5,500 current and former employees. In total, there are approximately
27 15,700 current and former employees at Uber who are subject to legal holds, including the hold
28

1 for this matter.

2 I declare under penalty of perjury that the foregoing is true and correct.

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4 Executed on December 22, 2023

DocuSigned by:
William Anderson
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William Anderson

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DECLARATION OF WILLIAM ANDERSON IN SUPPORT OF DEFENDANTS' OPPOSITION TO
PLAINTIFFS' MOTION TO ENFORCE PTO NO. 2 AND TO COMPEL DEFENDANTS
TO PRODUCE LITIGATION HOLD AND PRESERVATION INFORMATION

FILER'S ATTESTATION

I, Randall S. Luskey, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

DATED: December 22, 2023

PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP

By: /s/ Randall S. Luskey

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